

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

VANCE DOTSON,)	
)	
Plaintiff,)	
)	
Vs.)	Case No. 5:17-cv-00575-D
)	
ENERGY FUTURE HOLDINGS)	
CORP. d/b/a TXU ENERGY,)	
EXPERIAN INFORMATION)	
SOLUTIONS, INC., ET AL.)	
)	
Defendants.)	

**EXPERIAN INFORMATION SOLUTIONS, INC.’S MOTION TO STAY
CERTAIN SCHEDULING ORDER DEADLINES AND REQUEST FOR
EXPEDITED CONSIDERATION**

I. Relief Requested

Defendant Experian Information Solutions, Inc. (“Experian”) respectfully moves to stay the following deadlines, numbered 8 through 16 in the Court’s Scheduling Order (Dkt. No. 43):

- 8 – Trial Docket, currently scheduled for May 14, 2019
- 9 – Designations of deposition testimony, currently due on March 14, 2019
- 10 – Motions in Limine, currently due on March 14, 2019
- 11 – Requested voir dire, currently due on March 14, 2019
- 12 – Trial briefs, currently due on March 14, 2019
- 13 – Requested jury instructions, currently due on March 14, 2019
- 14 – Proposed findings and conclusions of law, currently due on March 14, 2019
- 15 – Objections or responses to the trial submissions (filed within 14 days after trial submission)
- 16 – Final Pretrial Report, currently due on March 14, 2019

The Scheduling Order states that, “[t]he parties may also move to stay unexpired scheduling order deadlines pending the Court’s ruling on dispositive motions.” Dkt. No. 43 at ¶ 7. Experian filed its Motion for Summary Judgment on February 8, 2019. *See* Dkt. No. 75. As contemplated by the Scheduling Order, a stay of the above referenced deadlines would result in increased efficiency for and preserve the resources of the Court and the parties.

II. Conference with Plaintiff and Request for Shortening of Response Time and for Expedited Consideration

Pursuant to LCvR7.1(k), counsel for Experian hereby certifies that he conferred with Plaintiff in an attempt to reach an agreement regarding the requested stay of the deadlines identified above. Despite Plaintiff’s prior motion to extend all deadlines, he will not agree to join this motion to extend the above unexpired deadlines. In light of the upcoming pretrial deadlines on March 14, 2019, and in order to preserve the resources of the parties, Experian respectfully requests that the Court order Plaintiff to file any response to this motion by March 7, 2019 and further respectfully requests that the Court rule on this motion prior to March 14, 2019. *See* W.D. Okla. Local Rule 7.1(g) (“The court may shorten or lengthen the time in which to respond.”). Counsel for Experian hereby certifies that he conferred with Plaintiff concerning the request that the time for his response be shortened and Plaintiff failed to respond.¹

¹ Experian is submitting separate orders relating to its request to shorten the time for Plaintiff’s response and for its motion to stay the above-described deadlines.

For the reasons stated above, Experian respectfully requests that this Court stay the deadlines numbered 8-16 in the Court's Scheduling Order and further requests that the Court expedite its consideration of its motion as set forth above.

Dated February 27, 2019.

s/Jimmy K. Goodman

Jimmy K. Goodman, OBA #3451
Crowe & Dunlevy
324 N. Robinson Ave., Ste. 100
Oklahoma City, OK 73102
Telephone: (405) 235-7700
goodmanj@crowedunlevy.com

William R. Taylor
Admitted *Pro Hac Vice*
JONES DAY
717 Texas Street, Ste. 3300
Houston, TX 77002-7212
Telephone: (832) 239-3939
wrtaylor@jonesday.com

Certificate of Service

I hereby certify that on this 27th day of February, 2019, I filed the foregoing document with the Court through the Court's CM/ECF system. I further certify that I served a true and correct copy of the foregoing document on Plaintiff by U.S. Mail at the following addresses:

Vance Dotson
1415 N.W. 43rd St.
Oklahoma City, OK 73118

Vance Dotson
1709 Albany Ave
Oklahoma City, OK 73111
Pro se

Jimmy K. Goodman
Jimmy K. Goodman